

Pro Se 1 (Rev. 12/16) Complaint for a Civil Case

UNITED STATES DISTRICT COURT

for the
Western District of Michigan
Southern Division

FILED - GR

February 28, 2018 2:13 PM

CLERK OF COURT
 U.S. DISTRICT COURT
 WESTERN DISTRICT OF MICHIGAN
 BY: mkc SCANNED BY: MW 2/28/18

1:18-cv-210

Janet T. Neff
 U.S. District Judge

DAN WEESE
Cheryl Sult-Weese

Plaintiff(s)

(Write the full name of each plaintiff who is filing this complaint. If the names of all the plaintiffs cannot fit in the space above, please write "see attached" in the space and attach an additional page with the full list of names.)

-v-

KALAMAZOO Metro Transit

Defendant(s)

(Write the full name of each defendant who is being sued. If the names of all the defendants cannot fit in the space above, please write "see attached" in the space and attach an additional page with the full list of names.)

Case No. _____

(to be filled in)

Jury Trial: (check one) ☒ Yes ☐ No

COMPLAINT FOR A CIVIL CASE

I. The Parties to This Complaint

A. The Plaintiff(s)

Provide the information below for each plaintiff named in the complaint. Attach additional pages if needed.

Name

Street Address

City and County

State and Zip Code

Telephone Number

E-mail Address

KA Dan Weese Cheryl
4001 North Deadwood Sult-Weese
KA Portage, Kalamazoo Drive
Michigan 49002
269-216-3647
Danweese49@yahoo.com

B. The Defendant(s)

Provide the information below for each defendant named in the complaint, whether the defendant is an individual, a government agency, an organization, or a corporation. For an individual defendant, include the person's job or title (if known). Attach additional pages if needed.

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Defendant No. 1

Name
Job or Title *(if known)*
Street Address
City and County
State and Zip Code
Telephone Number
E-mail Address *(if known)*

Kalamazoo Metro Transit
Director
530 North Rose Street
Kalamazoo, MI Kalamazoo
Michigan 49007
269-337-8222

Defendant No. 2

Name
Job or Title *(if known)*
Street Address
City and County
State and Zip Code
Telephone Number
E-mail Address *(if known)*

Defendant No. 3

Name
Job or Title *(if known)*
Street Address
City and County
State and Zip Code
Telephone Number
E-mail Address *(if known)*

Defendant No. 4

Name
Job or Title *(if known)*
Street Address
City and County
State and Zip Code
Telephone Number
E-mail Address *(if known)*

II. Basis for Jurisdiction

Federal courts are courts of limited jurisdiction (limited power). Generally, only two types of cases can be heard in federal court: cases involving a federal question and cases involving diversity of citizenship of the parties. Under 28 U.S.C. § 1331, a case arising under the United States Constitution or federal laws or treaties is a federal question case. Under 28 U.S.C. § 1332, a case in which a citizen of one State sues a citizen of another State or nation and the amount at stake is more than \$75,000 is a diversity of citizenship case. In a diversity of citizenship case, no defendant may be a citizen of the same State as any plaintiff.

What is the basis for federal court jurisdiction? *(check all that apply)*

☒ Federal question

☐ Diversity of citizenship

Fill out the paragraphs in this section that apply to this case.

A. If the Basis for Jurisdiction Is a Federal Question

List the specific federal statutes, federal treaties, and/or provisions of the United States Constitution that are at issue in this case.

42 U.S.C. 2000D 49 CFR 27 42 U.S.C. 12111
(10)
42 U.S.C. 4051 49 CFR 37

B. If the Basis for Jurisdiction Is Diversity of Citizenship**1. The Plaintiff(s)****a. If the plaintiff is an individual**

The plaintiff, (name) Dan Weese/Cheryl Solt-weese, is a citizen of the
State of (name) Michigan.

b. If the plaintiff is a corporation

The plaintiff, (name) _____, is incorporated
under the laws of the State of (name) _____,
and has its principal place of business in the State of (name) _____.

(If more than one plaintiff is named in the complaint, attach an additional page providing the same information for each additional plaintiff.)

2. The Defendant(s)**a. If the defendant is an individual**

The defendant, (name) _____, is a citizen of
the State of (name) _____. Or is a citizen of
(foreign nation) _____.

b. If the defendant is a corporation

The defendant, (name) Kalamazoo Metro Transit is incorporated under the laws of the State of (name) Michigan, and has its principal place of business in the State of (name) Michigan.
Or is incorporated under the laws of (foreign nation) _____, and has its principal place of business in (name) Michigan.

(If more than one defendant is named in the complaint, attach an additional page providing the same information for each additional defendant.)

3. The Amount in Controversy

The amount in controversy—the amount the plaintiff claims the defendant owes or the amount at stake—is more than \$75,000, not counting interest and costs of court, because (explain):

\$40 million

III. Statement of Claim

Write a short and plain statement of the claim. Do not make legal arguments. State as briefly as possible the facts showing that each plaintiff is entitled to the damages or other relief sought. State how each defendant was involved and what each defendant did that caused the plaintiff harm or violated the plaintiff's rights, including the dates and places of that involvement or conduct. If more than one claim is asserted, number each claim and write a short and plain statement of each claim in a separate paragraph. Attach additional pages if needed.

Cause undo Hardship for being able to use the transit by Refusing to American with Disability Act Reasonable Accommodation

IV. Relief

State briefly and precisely what damages or other relief the plaintiff asks the court to order. Do not make legal arguments. Include any basis for claiming that the wrongs alleged are continuing at the present time. Include the amounts of any actual damages claimed for the acts alleged and the basis for these amounts. Include any punitive or exemplary damages claimed, the amounts, and the reasons you claim you are entitled to actual or punitive money damages.

we are seeking Relief for Conding Violation of the issues in this Complaint asking for \$40 million

V. Certification and Closing

Under Federal Rule of Civil Procedure 11, by signing below, I certify to the best of my knowledge, information, and belief that this complaint: (1) is not being presented for an improper purpose, such as to harass, cause unnecessary delay, or needlessly increase the cost of litigation; (2) is supported by existing law or by a nonfrivolous argument for extending, modifying, or reversing existing law; (3) the factual contentions have evidentiary support or, if specifically so identified, will likely have evidentiary support after a reasonable opportunity for further investigation or discovery; and (4) the complaint otherwise complies with the requirements of Rule 11.

A. For Parties Without an Attorney

I agree to provide the Clerk's Office with any changes to my address where case-related papers may be served. I understand that my failure to keep a current address on file with the Clerk's Office may result in the dismissal of my case.

Date of signing:

2/24/18

Signature of Plaintiff

Printed Name of Plaintiff

[Handwritten Signature]
 Dan Weese / Cheryl Solt-Weese
 Dan weese / Cheryl Solt-Weese

B. For Attorneys

Date of signing: _____

Signature of Attorney _____

Printed Name of Attorney _____

Bar Number _____

Name of Law Firm _____

Street Address _____

State and Zip Code _____

Telephone Number _____

E-mail Address _____

UNITED STATES DISTRICT COURT
FOR THE WESTERN DISTRICT
OF MICHIGAN
SOUTHERN DIVISION

DAN WEESE

CHERYL SULT-WEESE

4001 NORTH DEADWOOD DRIVE

PORTAGE MICHIGAN 49002

269-216-3647

V.

KALAMAZOO METRO TRANSIT

530 NORTH ROSE STREET

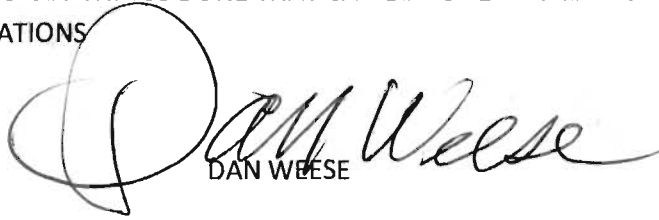
KALAMAZOO MICHIGAN 49007

269-337-8222

ON SEPT 2ND 2016 AT 2:15P ON ROUTE 2 WE WAS UNABLE TO USE THE BUS TO GET OUR SUPPLIES AND GROCERIES HOME WITHOUT FINDING ANOTHER BUS THAT WOULD LET US USE THE GROCERY CART ON THEIR BUS AND WE DID BUT WE HAVE BEEN UNABLE TO USE THE BUS SINCE FOR THIS PURPOSE WE HAVE HAD TO BARTER WITH OTHERS TO GET THIS DONE WHICH HAS COST US MORE MONEY OVER TIME

WE ASK FOR RELIF UNDER THE AMERICAN WITH DISABLILITY ACT REASONABLE
ACCOMMODATION SO WE ARE NOT UNDER SO MUCH STRESS TO FIGURE OUT HOW TO GET IT
DONE EVERY MONTH

ALSO RELIF UNDER 42U.S.C. 12111(10) IT HAS CAUSED A UNDUE HARDSHIP ON US MONEY
WISE AND EMOTIONALLY TO GET THINGS DONE THAT CAN BE DONE BY THE BUS UNDER
REASONABLE ACCOMMODATIONS



DAN WEESE



CHERYL SULT-WEESE

Dan Weese / Cheryl Sult-Weese
4001 North Deadwood Drive
Portage, MI 49002



United State District Court
110 Michigan Ave.
Grand Rapids Michigan
49503